

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JUDGE NATHAN

UNITED STATES OF AMERICA

- v. -

BRANDON JONES,  
a/k/a "Brandon McGeer,"  
a/k/a "Brandon Jones-McGeer,"

Defendant.

INDICTMENT

16 Cr. **16 CRIM 553**

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: **AUG 11 2016**

COUNT ONE

The Grand Jury charges:

1. From at least in or about February 2015 up to and including at least July 2016, in the Southern District of New York and elsewhere, BRANDON JONES, a/k/a "Brandon McGeer," a/k/a "Brandon Jones-McGeer," the defendant, falsely assumed and pretended to be an officer and employee acting under the authority of the United States and a department, agency and officer thereof, and acted as such, and in such pretended character demanded and obtained money and things of value, to wit, JONES claimed to be a Commissioner with the Office of the Commissioner, an organization purportedly associated with the United States government.

(Title 18, United States Code, Sections 912 and 2.)

COUNT TWO

The Grand Jury further charges:

2. From at least in or about February 2015 up to and including

at least in or about July 2016, in the Southern District of New York and elsewhere, BRANDON JONES, a/k/a "Brandon McGeer," a/k/a "Brandon Jones-McGeer," the defendant, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, did transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, to wit, JONES sent emails falsely representing that he was a government official and attaching purchase orders for the purpose of obtaining things of value, including accommodations.

(Title 18, United States Code, Sections 1343 and 2.)

COUNT THREE

The Grand Jury further charges:

3. From at least in or about February 2015 up to and including in or about July 2016, in the Southern District of New York and elsewhere, BRANDON JONES, a/k/a "Brandon McGeer," a/k/a "Brandon Jones-McGeer," the defendant, and others known and unknown, willfully and knowingly, did combine, conspire, confederate, and agree together and with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343.

4. It was a part and object of the conspiracy that BRANDON JONES, a/k/a "Brandon McGeer," a/k/a "Brandon Jones-McGeer," the

defendant, and others known and unknown, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

(Title 18, United States Code, Section 1349.)

COUNT FOUR

The Grand Jury further charges:

5. From at least in or about February 2015 up to and including at least in or about July 2016, in the Southern District of New York and elsewhere, BRANDON JONES, a/k/a "Brandon McGeer," a/k/a "Brandon Jones-McGeer," did pass, utter, present, offer, broker, issue, sell, and attempt and cause the same, and with like intent possess, within the United States, a false and fictitious instrument, document, and other item appearing, representing, purporting, and contriving through scheme and artifice, to be an actual security and other financial instrument issued under the authority of the United States, a foreign government, a State, and other political subdivision of the United States, and an organization, to wit, JONES created and tendered false and fictitious purchase orders and government travel

requests purporting to be issued under the authority of the United States government.

(Title 18, United States Code, Sections 514(a)(2) and 2.)

FIRST FORFEITURE ALLEGATION

6. As the result of committing the offenses alleged in Counts Two and Three of this Indictment, BRANDON JONES, a/k/a "Brandon McGeer," a/k/a "Brandon Jones-McGeer," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

SECOND FORFEITURE ALLEGATION

7. As the result of committing the offense charged in Count Four of this Indictment, BRANDON JONES, a/k/a "Brandon McGeer," a/k/a "Brandon Jones-McGeer," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 492 and Title 28 United States Code, Section 2461(c), all counterfeits of any coins and obligations and other securities of the United States, and any articles, devices and other things made, possessed, and used to commit the violation alleged in Count Four of this Indictment and any material or apparatus used and intended to be used, in the making

of such counterfeits, articles, devices and things, found in the possession of the defendant without authority from the Secretary of the Treasury.

SUBSTITUTE ASSET PROVISION

8. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third person;

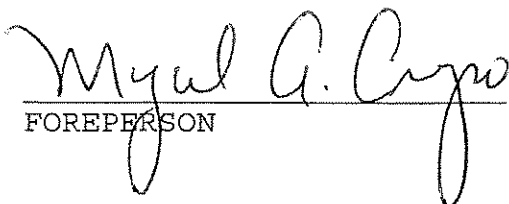
(c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28 United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981 and 492;  
Title 21, United States Code, Section 853; and  
Title 28, United States Code, Section 2461.)

  
FOREPERSON

  
PREET BHARARA  
United States Attorney

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INDICTMENT

16 Cr.

(18 U.S.C. §§ 912, 1343, 1349, 514, and 2.)

PREET BHARARA  
United States Attorney.

A TRUE BILL

Foreperson.

Miguel A. Crespo

8/11/16

8/11/16. Filed Indictment  
cc Case assigned to J. Nathan  
J. Pitman  
USM2